UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

-----X

DANIEL NEKATALOV and NINA YAGUDAYEVA,

Civil Action No.:

07-CV-6533

Plaintiffs,

-against-

RULE 7.1 DISCLOSURE

J. Berman

JEFFERSON VALLEY MALL, JEFFERSON VALLEY MALL LIMITED PARTNERSHIP, M.S. MANAGEMENT ASSOCIATES, INC., and SIMONS PROPERTY GROUP, INC.,

M.J. Peck

Defendants.

-----x

Pursuant to Local Civil Rule 7.1 of the Rules of this Court, defendant JEFFERSON VALLEY MALL LIMITED PARTNERSHIP s/h/a JEFFERSON VALLEY MALL and JEFFERSON VALLEY MALL LIMITED PARTNERSHIP (hereinafter "JEFFERSON"), by its attorneys Simmons, Jannace & Stagg, L.L.P, submits the following identification of corporate parents, subsidiaries and affiliates:

- 1) JEFFERSON SIMON PROPERTY, INC., a Delaware Corporation, 1% general partner;
- 2) SIMON PROPERTY GROUP, L.P., a Delaware limited partnership, 99% limited partner.

Dated: Syosset, New York September 14, 2007 SIMMONS, JANNACE & STAGG, L.L.P.
Attorneys for Defendants
JEFFERSON VALLEY MALL LIMITED
PARTNERSHIP, M.S. MANAGEMENT
ASSOCIATES, INC. and SIMON
PROPERTY GROUP, L.P. s/h/a SIMONS
PROPERTY GROUP, INC.

By: /s/Thomas E. Stagg
Thomas E. Stagg (ts-0663)

Office & P.O. Address
75 Jackson Avenue, Suite 100

Syosset, New York 11791-3139
(516) 357-8100

To: STEPHEN R. KRAWITZ, LLC.
Attorneys for Plaintiffs
271 Madison Avenue
Suite 200
New York, New York 10016
(212) 682-0707